
From: Carlin, Jayne
To: Jacobson, Martin
CC: Wu, Jennifer; Henning, Alan; Flahive, Katie; Wayne, Don; allison.castellan@noaa.gov
Sent: 2/10/2015 5:22:23 PM
Subject: OR CZARA Agriculture Public Comments

Hi Marty,

Below are links to public comments pertaining to agriculture (<http://coast.noaa.gov/czm/pollutioncontrol/oregondocket/public-comments/>). I attempted to only include ones that actually provided comments or feedback on the questions we posed rather than statements or opinions but I skimmed them quickly. Could you review and delete those that do not and highlight those that are particularly compelling or significant.

See language below from the decision document.

Although the federal agencies initially found that those programs enabled the State to satisfy the agriculture condition, prior to announcing the proposed decision, some specific concerns with the State's agriculture program were brought to the federal agencies' attention, such as:

- *Enforcement is limited and largely complaint-driven; it is unclear what enforcement actions have been taken in the coastal nonpoint management area and what improvements resulted from those actions.*
- *The AWQMA plan rules are general and do not include specific requirements for implementing the plan recommendations (e.g., specific buffer requirements to adequately protect water quality and fish habitat).*
- *AWQMA planning has focused primarily on impaired areas when the focus should be on both protection and restoration.*
- *The State does not administer a formalized process to track implementation and effectiveness of AWQMA plans.*
- *AWQMA planning and enforcement does not address "legacy" issues created by agriculture activities that are no longer occurring.*

Given these concerns, NOAA and EPA chose to solicit additional public comment on whether the State had satisfied the 6217(g) agriculture management measure requirements and the conditions related to agriculture placed on its program. The federal agencies appreciate the comments provided and are considering them closely. NOAA and EPA will work with the State, as necessary, to ensure it has programs and policies in place to satisfy all CZARA 6217(g) requirements for agriculture before proposing and making a final decision that the State has a fully approved coastal nonpoint program.

82 http://coast.noaa.gov/czm/pollutioncontrol/media/Individual_032114.pdf

80 http://coast.noaa.gov/czm/pollutioncontrol/media/Individual_032014_31.pdf

79 http://coast.noaa.gov/czm/pollutioncontrol/media/Individual_032014_30.pdf

75 http://coast.noaa.gov/czm/pollutioncontrol/media/Individual_032014_26.pdf

74 http://coast.noaa.gov/czm/pollutioncontrol/media/Individual_032014_25.pdf

73 http://coast.noaa.gov/czm/pollutioncontrol/media/Individual_032014_24.pdf

71 http://coast.noaa.gov/czm/pollutioncontrol/media/Individual_032014_22.pdf

70 http://coast.noaa.gov/czm/pollutioncontrol/media/Individual_032014_21.pdf

69 http://coast.noaa.gov/czm/pollutioncontrol/media/Individual_032014_20.pdf

68 http://coast.noaa.gov/czm/pollutioncontrol/media/Individual_032014_19.pdf

65 http://coast.noaa.gov/czm/pollutioncontrol/media/Individual_032014_16.pdf

64 http://coast.noaa.gov/czm/pollutioncontrol/media/Individual_032014_15.pdf

61 http://coast.noaa.gov/czm/pollutioncontrol/media/Individual_032014_12.pdf

60 http://coast.noaa.gov/czm/pollutioncontrol/media/Individual_032014_11.pdf

58 http://coast.noaa.gov/czm/pollutioncontrol/media/Individual_032014_9.pdf

55 http://coast.noaa.gov/czm/pollutioncontrol/media/Individual_032014_6.pdf

52 http://coast.noaa.gov/czm/pollutioncontrol/media/Individual_032014_3.pdf and Attachments:

- § [303\(d\)](#) (321mb)
- § [Attachments to Emailed Comments](#) (24mb)
- § [Comments on WA Forest Practices HCP](#) (1mb)
- § [FOIA documents](#) (60mb)
- § [Frissell Decl. & Literature](#) (193mb)
- § [General](#) (449mb)
- § [NWEA Pesticide Petition](#) (13mb)
- § [NWEA v. Locke Settlement Agreement](#) (1mb)
- § [Oregon 2000 NPS Pollution Control Plan](#) (3mb)
- § [Rhodes Decl. & Literature](#) (69mb)
- § [WA FP HCP \(Dec. 2005\)](#) (49mb)
- § [Additional Emails, Letters and Documents](#)(116mb)

48 http://coast.noaa.gov/czm/pollutioncontrol/media/Individual_031914_15.pdf

36 http://coast.noaa.gov/czm/pollutioncontrol/media/Individual_031914_3.pdf

31 http://coast.noaa.gov/czm/pollutioncontrol/media/Individual_031714_2.pdf

23 http://coast.noaa.gov/czm/pollutioncontrol/media/Individual_030914.pdf

15 http://coast.noaa.gov/czm/pollutioncontrol/media/Individual_022014.pdf

8 http://coast.noaa.gov/czm/pollutioncontrol/media/Individual_122213_2.pdf

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www.epa.gov/r10earth/tmdl.htm

Non-Responsive